## UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

AVAGO TECHNOLOGIES GENERAL IP (SINGAPORE) PTE. LTD.,

Plaintiff,

v.

Civil Action No. 2:15-cv-239- JRG

ASUSTEK COMPUTER INC. and ASUS COMPUTER INTERNATIONAL,

**JURY TRIAL DEMANDED** 

Defendants.

# JOINT MOTON FOR ENTRY OF DISCOVERY ORDER, E-DISCOVERY ORDER AND PROTECTIVE ORDER

COME NOW, Plaintiff, Avago Technologies General IP (Singapore) PTE. LTD., and Defendants, ASUSTEK COMPUTER INC. and ASUS COMPUTER INTERNATIONAL, and files this Joint Motion for Entry of Discovery Order, E-Discovery Order and Protective Order, and would show the Court as follows:

I.

The parties hereby request the Court enter the Discovery Order, E-Discovery Order and Protective Order attached hereto.

WHEREFORE, PREMISES CONSIDERED, the parties respectfully request that the Court grant this Motion and enter the attached Discovery Order, E-Discovery Order and Protective Order and for such other and further relief as the parties may show themselves justly entitled.

**DATED**: June 11, 2015

Respectfully submitted,

### /s/ Elizabeth L. DeRieux

S. Calvin Capshaw TX Bar No. 03783900 ccapshaw@capshawlaw.com

Elizabeth L. DeRieux TX Bar No. 05770585 Frederick G. Michaud DC Bar No. 177675

fmichaud@capshawlaw.com CAPSHAW DeRIEUX, LLP 114 East Commerce Avenue Gladewater, Texas 75647 Telephone: (903) 236-9800 Facsimile: (903) 236-8787

## KILPATRICK TOWNSEND & STOCKTON LLP

Kristopher L. Reed

kreed@kilpatricktownsend.com

David E. Sipiora

dsipiora@kilpatricktownsend.com

Matthew C. Holohan

mholohan@kilpatricktownsend.com

John D. Cadkin

jcadkin@kilpatricktownsend.com

Suite 600, 1400 Wewatta Street

Denver, CO, 80202

Telephone: (303) 571-4000 Facsimile: (303) 571-4321

ATTORNEYS FOR PLAINTIFF AVAGO TECHNOLOGIES GENERAL IP (SINGAPORE) PTE. LTD

### Respectfully submitted,

/s/ Michael J. Newton by permission ELD

Michael J. Newton Alston & Bird

2828 North Harwood Street

18<sup>th</sup> Floor

Dallas, Texas 75201-2139

Tel: 214-922-3423 Fax: 214-922-3863

mike.newton@alston.com

Michael C. Smith

Texas Bar No. 18650410

SIEBMAN, BURG, PHILLIPS & SMITH,

LLP

113 East Austin Street, P.O. Box 1556

Marshall, TX 75671

Telephone: (903) 938-8900 Facsimile: (972) 767-4620

Email: michaelsmith@siebman.com

ATTORNEY FOR DEFENDANTS
ASUSTEK COMPUTER INC. AND
ASUS COMPUTER INTERNATIONAL

### **CERTIFICATE OF CONFERENCE**

I hereby certify that I have complied with the Local Rule CV-7. Specifically, I have conferred with counsel for Defendants who have consented to the joint filing of this motion.

/s/ John Cadkin by permission ELD
John Cadkin

### **CERTIFICATE OF SERVICE**

I hereby certify that the all counsel of record who are deemed to have consented to electronic service are being served this 11th day of June, 2015, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3). Any other counsel of record will be served by electronic mail, facsimile transmission and/or first class mail on this same date.

/s/ Elizabeth L. DeRieux
Elizabeth L. DeRieux